



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

MAR 18 2014

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

**Article Number: 7006-2760-0000-8644-5377**

Mr. Rick Sederquist  
Environmental Safety and Health Manager  
Carleton Life Support Systems, Inc.  
2734 Hickory Grove Road  
Davenport, Iowa 52804

RE: Carleton Life Support Systems, Inc.  
Davenport, Iowa  
RCRA ID No.: IAD005268420

Dear Mr. Sederquist:

Letter of Warning/Request for Information

On May 8-9, 2013, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report, your June 3, 2013, response to the Notice of Preliminary Findings (NOPF), and your October 9 and December 20, 2013, responses to the EPA's September 6 and November 22, 2013, Letters of Warning/Requests for Information and determined that violations of RCRA were documented. We are requesting additional information regarding your facility's compliance status. Enclosed is a list of violations followed by a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.



Printed on Recycled Paper

Within thirty (30) calendar days of receiving this letter, please mail your response to: Ms. Deborah Bredehoft, AWMD/WEMM, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Ms. Bredehoft, of my staff, at (913) 551-7164.

APR 8 1994  
Sincerely,



Donald Toensing, Chief  
Waste Enforcement and Materials Management Branch  
Air and Waste Management Division

Enclosures (3)

cc: Mr. Cal Lundberg, Chief, Contaminated Sites Section  
Iowa Department of Natural Resources

List of Violations  
Carleton Life Support Systems, Inc.  
Davenport, Iowa  
RCRA ID No.: IAD005268420

1. \* Title 40 Code of Federal Regulations (40 CFR) 262.34(a)(4) referencing 40 CFR 265.53(b) – Failure to submit the RCRA Contingency Plan to local emergency agencies.
2. \* 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d) – Failure to list the home addresses of the emergency coordinators in the RCRA Contingency Plan.
3. \*40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e) – Failure to list and describe the capabilities of the emergency equipment in the RCRA Contingency Plan.
4. \* 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f) – Failure to include a complete evacuation plan in the RCRA Contingency Plan.
5. Rescinded
6. \* 40 CFR 273.13(d)(1) – Failure to close three universal waste accumulation containers of waste lamps.
7. Rescinded
8. Rescinded
9. Rescinded
10. Rescinded
11. Rescinded
12. 40 CFR 262.11 – Failure to make an adequate hazardous waste determination on wastewater treatment sludge.

\*The following violation was adequately addressed through previous correspondence.

Requested information  
Carleton Life Support Systems, Inc.  
Davenport, Iowa  
RCRA ID No.: IAD005268420

1. With regard to Violation Number 12, in your October 9, 2013, response, you provided a copy of the material safety data sheet (MSDS) for Iridite 14-2 and a copy of your September 19, 2013, manifest. The manifest showed that your facility is now manifesting the Refueling Wash Water Sludge as a D007/F019 hazardous waste. The underlying hazardous constituents of F019 are chromium and cyanide. The MSDS for the Iridite 14-2 states that the composition includes 7-10% ferricyanide. In accordance with 40 CFR 262.11(d), if the waste is determined to be a hazardous waste, the generator needs to comply with 40 CFR 268. Within the EPA's November 22, 2013, letter, the EPA requested that you state if the Refueling Waste Water Sludge exceeded the land disposal restriction (LDR) for cyanide. Within your response, you stated that you understood that LDRs only applied to hazardous wastes that were land disposed and since the Refueling Waste Water Sludge was incinerated, you did not believe that LDRs applied. However, after the sludge is incinerated, the remaining ash is land disposed and therefore, the LDRs are still applicable. Therefore, please provide the following:
  - a. State if the Refueling Wash Water Sludge exceeds the cyanide LDR treatment standard concentration number listed in 40 CFR 268.40 at the point of generation.
  - b. If the Refueling Wash Water Sludge exceeds the LDR treatment standard for cyanide, please state any steps that your facility takes to reduce the cyanide levels in the waste sludge.
  - c. Please submit a copy of the correct LDR for this waste stream.

## 3007 RESPONSE INSTRUCTIONS

Identify the Person(s) responding to this request on your behalf.

Address each numbered item separately, and precede each answer with the number of the item to which it responds.

For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)

For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.

For each numbered item, identify all persons consulted in the preparation of the answer.

For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.

If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.

If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.

If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.

You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."

The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.

A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.

Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at [www.epa.gov/epahome/cfr40.htm](http://www.epa.gov/epahome/cfr40.htm).

This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.

The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.